

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

UBIQUITI NETWORKS, INC.,

*Plaintiff,*

v.

CAMBIUM NETWORKS, INC.;  
CAMBIUM NETWORKS, LTD.;  
BLIP NETWORKS, LLC;  
WINNCOM TECHNOLOGIES, INC.;  
SAKID AHMED; and DMITRY  
MOISEEV,

*Defendants.*

Civil Action No.: 1:18-cv-05369

**JURY TRIAL DEMANDED**

**DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL**

Pursuant to Local Rule 26.2 and the Agreed Confidentiality Order entered in this case (Dkt. #102), Defendants Cambium Networks, Inc. (“Cambium”) and Cambium Networks, Ltd. (“Cambium UK”), Blip Networks, LLC, Winncom Technologies, Inc., Sakid Ahmed, and Dmitry Moiseev (collectively the “Defendants”), respectfully request the Court to grant Defendants’ Motion for Leave to File Under Seal (the “Motion”) Exhibits 2 and 5 to Defendants’ Opposition to Plaintiff’s Motion to Compel De-Designation of Defendants’ Attorneys’ Eyes Only Production and For Sanctions.<sup>1</sup> In support of the Motion, Defendants state as follows:

1. WHEREAS, Plaintiff has filed a Motion to Compel De-Designation of Defendants’ Attorneys’ Eyes Only Production and for Sanctions (the “Motion to Compel”).

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<sup>1</sup> Pursuant to the Fourth Amended General Order In Re: Coronavirus COVID-19 Public Emergency (Dkt. No. 131), Defendants have noticed this motion for presentment at the earliest available date of July 15, 2020 – which date may be further subject to any individual orders entered by this Court with respect to the scheduling of such presentment hearings.

2. WHEREAS, Defendants have filed an Opposition to Plaintiff's Motion to Compel and, in support thereof, filed the Declaration of Jon Swenson, which attaches certain documents containing Defendants' highly confidential and sensitive business information as Exhibits 2 and 5.

3. WHEREAS, Defendants seek to file the above-referenced documents under seal as "CONFIDENTIAL RESTRICTED – ATTORNEYS' EYES ONLY" under the terms of the Agreed Confidentiality Order entered in this case.

WHEREFORE, for the foregoing reasons, Defendants respectfully request that the Court grant leave to file the above documents under seal.

Dated: June 4, 2020	<p>Respectfully submitted,</p> <p>BAKER BOTTS L.L.P.</p> <p><u>/s/ G. Hopkins Guy, III</u></p> <p>One of their attorneys</p> <p>G. Hopkins Guy III (CA Bar No. 124811) hop.guy@bakerbotts.com Jon V. Swenson (CA Bar No. 233054) jon.swenson@bakerbotts.com Karina Smith (CA Bar No. 286680) karina.smith@bakerbotts.com BAKER BOTTS L.L.P. 1001 Page Mill Road Building One, Suite 200 Palo Alto, CA 94304-1007 650.739.7500 (Phone) 650.739.7699 (Facsimile)</p> <p>Andrew D. Wilson (DC Bar No. 1030144) 700 K Street, N.W. Washington, DC 20001-5692 202.639.1312 (Phone) 202.508.9336 (Fax)</p>
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	<p>andrew.wilson@bakerbotts.com</p> <p>Arthur J. Gollwitzer (06225038) agollwitzer@michaelbest.com James P. Fieweger (6206915) jpfieweger@michaelbest.com MICHAEL BEST &amp; FRIEDRICH, LLP 444 West Lake Street, Suite 3200 Chicago, Illinois 60606 312.222.0800 (Phone)</p> <p><i>Attorneys for Defendants Cambium Networks, Inc. et al.</i></p>
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**CERTIFICATE OF SERVICE**

I hereby certify that on June 4, 2020, I electronically filed the foregoing **DEFENDANTS' MOTION FOR LEAVE TO FILE UNDER SEAL** with the Clerk of the Court using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users.

/s/ G. Hopkins Guy, III